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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

MICHAEL ALEXANDER, AN
INDIVIDUAL,

PLAINTIFF,

CASE NO.: 2:22-CV-01084-CDS-NJK

VS.

JOINT STIPULATED
CONFIDENTIALITY ORDER

COREY CHADWICK, AN INDIVIDUAL;
DOE INDIVIDUALS AND ROE
ENTITIES 1-10.

DEFENDANT.

COREY CHADWICK, AN INDIVIDUAL,

COUNTERCLAIMANT,

VS.

MICHAEL ALEXANDER, AN
INDIVIDUAL,

COUNTERDEFENDANT.

The Court, having reviewed the pleadings and determined that this is a case involving confidential information and having been advised that the parties have stipulated to the entry of a confidentiality order, finds that entry of this Agreed Confidentiality Order is appropriate. It is therefore ORDERED that:

The parties have agreed to the following discovery exchange:

1. ~~The Amended Motion to Compel Discovery [DOC 71] (the "Motion") filed September 5, 2024, by Plaintiff Michael Alexander ("Alexander") is granted as follows:~~

a. Defendant Corey Chadwick ("Chadwick") shall provide to Alexander's counsel of record and Alexander's expert witness(es) full legacy access to the Binance

1 account set up by Chadwick to receive and trade Alexander's Bitcoin pursuant to the
2 Bitcoin Trading Agreement between the parties dated February 21, 2019; which
3 includes providing the current login ID, password, and access to any verification
4 methods required by Binance.

5 b. Chadwick shall provide read-only, not transactional, access to any and
6 all cold-storage wallets and/or platform access to which the cryptocurrency was
7 transferred from such Binance account; which includes providing the extended master
8 public keys that allow analysis of the data on the wallets or platforms, including all
9 content, addresses, transactions, dates and other pertinent information.

10 c. Chadwick shall provide read-only access to any private, non-custodial
11 wallet or platform to which Chadwick sent Alexander's cryptocurrency referenced in
12 the Agreement other than the 'cold storage wallet' referenced in (b) above, which
13 includes providing the extended master public keys that allow analysis of the data on all
14 wallets and platforms including all content, addresses, transactions, dates and other
15 pertinent information.

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17 2. Alexander's counsel of record shall provide the access information provided by
18 Chadwick pursuant to this Order only to Mr. Nicholas Himonidis and his firm, Alexander's
19 expert described in the Motion.

20 3. All information derived from the access information provided pursuant to this
21 Order shall be treated as "Attorney's Eyes Only" as described herein below.

22 4. All information required to be treated as "Attorney's Eyes Only" under this
23 Order shall only be received and reviewed by Alexander's counsel of record, Mr. Nicholas
24 Himonidis, and his firm. Alexander's counsel of record shall also promptly provide such
25 information to Chadwick's counsel of record.¹

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28 ¹ The restrictions in this Order shall not apply to Chadwick, his counsel or any expert
hired by him.

1 5. All information required to be treated as "Attorney's Eyes Only" under this
2 Order shall be used solely for the purpose of preparation and trial of this litigation and for no
3 other purpose whatsoever and shall not be disclosed to any person except in accordance with
4 the terms hereof.

5 6. In the event that Alexander believes that any information required to be treated
6 as "Attorney's Eyes Only" under this Order is not of a confidential nature appropriate for the
7 restrictions of this Order, the parties will attempt to resolve the issues raised and stipulate in
8 writing to designate such information as not subject to the restrictions of this Order; if no
9 resolution can be reached by the parties, Alexander may seek an Order from this Court finding
10 that such information is outside the scope of this Order.

11 7. Nothing in this Order shall prevent the parties, by written stipulation signed by
12 the parties, to provide for exceptions to this Order.

13 8. In the event a party wishes to use any information required to be treated as
14 "Attorney's Eyes Only" under this Order in any affidavits, briefs, memoranda of law, or other
15 Court in this litigation, such information used therein shall be filed under seal

See order issued
concurrently herewith

The Clerk of this Court is directed to maintain under seal all such documents
18 filed under seal with the Court in this litigation. The Court shall determine procedures it deems
19 appropriate for use of any such documents or information at trial or any evidentiary hearing.

20 9. Within sixty (60) days after conclusion of this litigation and any appeal thereof,
21 Alexander's counsel of record shall turn over to Chadwick's counsel of record all documents
22 and copies of documents which are subject to this Order.

23 10. All Confidential Information subject to this Order, produced or exchanged in the course
24 of this litigation, shall be used solely for the purpose of preparation and trial of this litigation
25 and for no other purpose whatsoever, and shall not be disclosed to any person except in
26 accordance with the terms hereof, unless required by Federal or State law, administrative
27 proceeding, appeal or other order of a State or Federal court.

28 11. The documents and requested information shall be provided one week after this Agreed

Confidentiality Order has been signed by the Judge.

DATED this 25th day of September, 2024.

Submitted by:

FRIEDMAN & FIEGER, LLP


ERNEST W. LEONARD, ESQ.

Admitted Pro Hac Vice

17304 Preston Road, Suite 300

Dallas, TX 75252

AND

KATHLEEN BLISS LAW PLLC

KATHLEEN BLISS, ESQ., NSB 7606

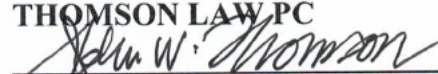
1070 W. Horizon Ridge Pkwy, Suite 202

Henderson, NV 89012

Attorneys for Defendant Corey Chadwick

Approved as to form and content:

THOMSON LAW PC



JOHN W. THOMSON, ESQ., NSB 5802

2900 W. Horizon Ridge Pkwy, Suite 200

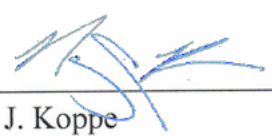
Henderson, NV 89052

john@thomsonlawpc.com

Attorney for Plaintiff Michael Alexander

IT IS SO ORDERED.

Dated: October 15, 2024


Nancy J. Koppe

United States Magistrate Judge